



# Safeguarding and Child Protection Policy 2025-26

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|---|--------------------------------|
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| <i>Unless there are legislative or regulatory changes in the interim, this policy will be reviewed annually. Should no substantive changes be required at that point, the policy will move to the next review cycle</i> |                                |

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## Academic Year: 2025-2026

|   |  |
|---|--|
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| Date:   | 8.10.25  |

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## 1. Introduction and purpose

We are committed to safeguarding children and expect all staff and visitors to the academy to share this commitment. We will always act in the best interest of the child.

The academy aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of, and fully understand, their statutory responsibilities with respect to safeguarding.
- Staff are effectively trained in recognising and reporting safeguarding issues as part of our culture of vigilance.
- A whole school approach to safeguarding (i.e., safeguarding culture) is clear and that safeguarding underpins all relevant systems and processes with a continuing commitment and ongoing vigilance. Within this culture it includes listening to children and taking account of their wishes.

## 2. Definitions

### **Safeguarding and promoting the welfare of children**

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Section 1 and 2 of the procedure manual below outlines the categories and types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 1 of the procedure manual below defines neglect in more detail.

**Children** includes everyone under the age of 18 in line with Keeping Children Safe in Education.

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Parents** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, adoptive parents, and LA (Local Authority) corporate parents.

### 3. Scope

Safeguarding and child protection is everyone’s responsibility. This policy applies to all staff (including supply staff), trustees, ambassadors, guest speakers and volunteers in the academy and is consistent with the procedures of the Local Safeguarding Partners. Our policy and procedures also apply to extended academy and off-site activities.

Whilst we fully adhere to this statutory requirement, our duty of care remains in place in full until a child completes their educational provision with us.

This extends from the beginning of the Early Years Foundation Stage to the end of Key Stage 5 and therefore beyond the age of 18. In such cases, our practice does not change in relation to safeguarding all our students. Therefore, where the policy refers to under the age of 18 as set out in legislation, the policy should also be read within this scope to meet in full our duty of care.

### 4. Legislation and regulation

This policy is based on the Department for Education’s (DfE) statutory guidance: Keeping Children Safe in Education and [Working Together to Safeguard Children](#). We comply with this guidance and the procedures set out by our local safeguarding partners (refer local circumstances Section 6 of the procedure manual for further information).

This policy complies with our Funding Agreement and Articles of Association, and meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

| This policy is also based on the following legislation:  |  |
|--|--|
| Section 175 of the <a href="#">Education Act 2002</a>  | Places a duty on schools and local authorities to safeguard and promote the welfare of children.   |
| <a href="#">The School Staffing (England) Regulations 2009</a>   | Sets out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques. |
| Part 3 of the schedule to the <a href="#">Education (Independent School Standards) Regulations 2014</a>                            | Places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school  |
| <a href="#">The Children Act 1989</a> (and <a href="#">2004 amendment</a> )  | Provides a framework for the care and protection of children   |
| Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the <a href="#">Serious Crime Act 2015</a> | Places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.                      |
| <a href="#">Statutory guidance on FGM</a>  | Sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.   |
| The Rehabilitation of Offenders Act 1974   | Outlines when people with criminal convictions can work with children  |
| Schedule 4 of the <a href="#">Safeguarding Vulnerable Groups Act 2006</a>  | Defines what ‘regulated activity’ is in relation to children   |
| <a href="#">Statutory guidance on the Prevent duty</a>   | Explains schools’ duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.                                     |

## 5. Policy statement

All children should be protected from risk of abuse and harm however, it is important to recognise that potentially, some children have an increased risk. Additional barriers can exist for some children with respect to recognising or disclosing abuse and harm therefore, we give special consideration to students who:

- Have special educational needs and/or disabilities
- Are in need of a social worker
- Are young carers
- May experience discrimination due to their race, ethnicity, faith and belief or no faith, age, gender identification; sexuality
- Are pregnant or in receipt of paternity/maternity leave
- Are married or in a civil partnership
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse, domestic abuse, or poor mental health
- Are at risk of FGM, sexual/criminal exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are looked after or who have been previously looked after
- Are privately fostered
- Are children missing education
- Have a parent or carer in custody, or is affected by parental offending
- Pupils who have experienced multiple suspensions, or at risk of permanent exclusion
- May be due to receive elective home education as formally requested by a parent/carers
- Are children accessing alternative provision

We ensure that all children have the same protection, regardless of any barriers they may face, and we are committed to anti-discriminatory practice and recognise children's diverse circumstances.

We are alert to the signs of abuse, neglect and exploitation, and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our pupils and take seriously what they tell us, children are aware of the adults they can talk to if they have a concern.

We will ensure concerns are discussed with parents first unless we have reason to believe that by doing so would be contrary to the child's welfare.

## 6. Recognising and responding to abuse

Staff must follow the procedures set out below in the event of a safeguarding concern as outlined in section 3 of the procedure manual below.

If a child is in immediate danger or where a child is suffering or is likely to suffer from harm, make a referral to children's social care and/or the Police. Anyone can make a referral. Any child, in any family, in any academy, could become a victim of abuse. Staff should always maintain an attitude of "It could happen here."

We recognise that abuse, neglect, exploitation, and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

We are aware that abuse, neglect exploitation are forms of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. In addition to this,

we recognise that harm can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects.

We are aware that abuse, neglect and exploitation may also take place outside of the home, known as contextual safeguarding, and this may include (but not limited to), sexual exploitation, criminal exploitation, serious youth violence, radicalisation.

Staff are aware that behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.

Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in section 1 and 2 in the procedure manual below and in *Keeping Children Safe in Education Part 1/Annex A/Annex B*.

| Types of safeguarding concerns   |   |
|--|---|
| <ul style="list-style-type: none"> <li>• unexplainable and/or persistent absence from education</li> <li>• child missing from home or care</li> <li>• child sexual exploitation (CSE), child criminal exploitation (CCE)</li> <li>• bullying including cyberbullying</li> <li>• domestic abuse</li> <li>• drugs</li> <li>• fabricated or induced illness</li> <li>• faith abuse</li> <li>• female genital mutilation (FGM)</li> <li>• forced marriage</li> <li>• gangs and youth violence</li> </ul> | <ul style="list-style-type: none"> <li>• gender-based violence/violence against women and girls (VAWG)</li> <li>• mental health difficulties</li> <li>• private fostering</li> <li>• radicalisation</li> <li>• youth produced sexual imagery (sexting)</li> <li>• teenage relationship abuse</li> <li>• trafficking</li> <li>• child on child abuse</li> <li>• upskirting</li> <li>• serious violence</li> <li>• sexual harassment</li> </ul> |

There will be occasions when staff may suspect that a pupil may be at risk but have no ‘real’ evidence. The pupil’s behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or needs safeguarding.

In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

## 7. Safeguarding concerns and allegations of abuse

### **Allegations and/or low-level concerns against staff**

Allegations and/or low-level concerns against staff will be handled in accordance with our procedures for dealing with allegations of abuse made against staff section 3 of the procedure manual below.

## Whistleblowing

The academy has a separate Whistleblowing policy that covers concerns regarding the way the academy safeguards pupils including, poor or unsafe practice, or potential failures.

## 8. Training

All staff will receive appropriate safeguarding and child protection training (including online safety) both at induction and regularly throughout the year as required. The training will be regularly updated.

All staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

| Role                           | Requirements   |
|--------------------------------|--|
| <b>Staff</b>                   | <p>Undertake regular safeguarding and child protection training at induction.</p> <p>Read and ensure understanding of the following:<br/>           Child Protection and Safeguarding Policy<br/>           Behaviour Policy<br/>           Staff Code of Conduct<br/>           Whistleblowing Procedures<br/>           Role of the DSL<br/>           Attendance Policy<br/>           Online Safety Policy</p> <p>Staff must understand the academy's safeguarding systems and their responsibilities and must be able to identify signs of possible abuse, neglect, and exploitation. Training will be updated annually and will be in line with advice from our Local Safeguarding Partners.</p> <p>All staff are responsible for ensuring that their individual understanding of safeguarding is always up to date and must be aware of who they should approach with concerns or questions.</p> <p>All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children susceptible to being drawn into terrorism and know how to challenge extremist ideas.</p> <p>All staff training will follow the trust Staff Safeguarding CPD (Continued Professional Development) Plan as a minimum expectation. Additional bespoke training will be coordinated by an academy as required (i.e., in line with local circumstances).</p> |
| <b>Governors</b>               | <p>Staff in 'governance' roles (including the Education Directorate Team/National Directors/Trustees) will receive safeguarding training from the National Director of Inclusion/Trust Safeguarding Leads that equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at academies are effective and support the delivery of a robust whole school approach to safeguarding.</p>   |
| <b>DSL and Deputy/Deputies</b> | <p>Ensure staff receive regular safeguarding and child protection updates (for example, through emails, e-bulletins, and staff meetings), at least termly.</p> <p>The DSL and Deputy/Deputies will undertake child protection and safeguarding training at least every two years.</p>  |

|                        |  |
|------------------------|--|
|                        | Update knowledge (particularly local knowledge of safeguarding risks) and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs (Designated Safeguarding Lead), or taking time to read and digest safeguarding policy documents and national updates).<br><br>Undertake Prevent awareness training.  |
| <b>Academy leaders</b> | Staff will be made aware of the specific needs of vulnerable children. Notably, social-worker children (SWC), those with SEND, those with relevant health conditions and young carers. This will include the additional safeguarding risks.<br><br>For pupils with SEND, staff must not make assumptions that indicators of possible abuse are simply attributable to the child's condition. It is essential that all concerns are explored thoroughly. Children with SEND may be more vulnerable to child-on-child abuse, may be disproportionately impacted without showing obvious signs, and may face additional barriers such as limited cognitive understanding (e.g., distinguishing fact from fiction online) or communication challenges in reporting harm. |
| <b>Pupils</b>          | The academy will ensure all pupils develop their knowledge and understanding of all safeguarding areas in an age-appropriate manner.<br><br>This will be mapped out by the academy at the start of each academic year and may take the form of assemblies, PSHE (Personal Social and Health Education) sessions, off-curriculum days, notice boards, displays, posters or bespoke sessions from external providers.<br><br>Where necessary, the academy will be responsive to local context and circumstances. Pupils will learn how to identify and manage risks as well as how to mitigate against those risks and how to raise a concern at any time.   |

## 9. Children missing education/Pupils frequently missing from education

The numbers of CME will be reported on by the academy regularly and will be reviewed by the Safeguarding Lead and Education Directors. Any concerns will be immediately addressed (i.e., asking about the steps being taken to trace and track the movement of CME pupils and actions being taken to ensure their safety). All our academies will adhere to the E-ACT Safeguarding Attendance Process.

Pupils frequently missing from education will be identified through academy unauthorised absence procedures and children missing education procedures. To support in ensuring all our pupils are safe, a weekly welfare check will be completed by the academy for any pupil who is absent for 5 consecutive days regardless of the reason for absence. Following the weekly welfare check and update should be logged on CPOMS.

A child who frequently goes missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation, or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system; come from new migrant families

| Taking Action  |  |
|----------------|--|
| <b>Staff</b>   | <p>Follow the academy procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect, and exploitation, including sexual exploitation, and to help prevent the risks of going missing in future.</p> <p>Understand the signs to look out for, and the individual triggers to be aware of, when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage. Record concerns on CPOMS and report to the DSL.</p>  |
| <b>DSL</b>     | <p>Inform the local authority if a child leaves the academy without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.</p> <p>Ensure Staff are trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.</p> <p>If a staff member suspects that a child is suffering from harm or neglect, follow local child protection procedures, including with respect to making reasonable enquiries.</p> <p>Make an immediate referral to the local authority children's social care team, and the Police if the child is in immediate danger or at risk of harm.</p> |
| <b>Parents</b> | <p>Provide at least two emergency contacts for their child and ensure the academy is updated if these numbers change.</p>  |

## 10. Recruitment – interview and panel appointments

At least one person on any interview/appointment panel for a post at the academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education and be in line with local safeguarding procedures. Further information relating to safer recruitment can be found in section 4 of the procedure manual below.

## 11. Supervision

All staff who have contact with children and families will be offered supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. This may be through their line management structure, academy safeguarding team meetings or specific safeguarding supervision from the trust.

Case management supervision is also provided to academies from Trust Safeguarding Leads via the E-ACT critical incident process.

## 12. Responsibilities

We will follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance (outlined in appendices 1 and 2), adhering to the roles, responsibilities and expectations identified for:

- Governing bodies, proprietors, and management committees
- The headteacher
- The designated safeguarding lead
- The deputy designated safeguarding lead/s
- Staff

| Role  | Responsibilities  |
|-------|---|
| Staff | <p>Read and sign to confirm their understanding of Part 1 and Annex B of Keeping Children Safe in Education and review this guidance at least annually. Annex A provides a condensed version of Part 1 and will be utilised for staff who do not work directly with children on a regular basis.</p> <p>All staff will understand:</p> <ul style="list-style-type: none"> <li>• Our systems which support safeguarding, including the staff code of conduct policy, the role of the Designated Safeguarding Lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education.</li> <li>• The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment; the process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play</li> <li>• What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including statutory duties such as reporting FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals</li> <li>• The signs of different types of abuse, neglect, and exploitation, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation</li> <li>• How to raise a safeguarding concern or allegation in relation to a member of staff, volunteer, or supply staff</li> <li>• How to implement appropriate pupil release procedures in line with academy expectations to ensure the duty of care for children is transferred to parents/carers</li> </ul> |
| DSL   | <p>The DSL takes lead responsibility for child protection and wider safeguarding.</p> <p>During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The contact details of the DSL and Deputy DSL and Regional Safeguarding Lead can be found at the front of this policy.</p> <p>When the DSL is absent, the deputy/deputies will act as cover.</p> <p>If the DSL and deputy/deputies are not available, the Headteacher must arrange for appropriate cover (for example, during out-of-hours/out-of-term activities). This may include the DSL or deputy/deputies being contactable by phone and the</p>   |

|                          |  |
|--------------------------|--|
|                          | <p>lead member of staff having access to this. Staff should speak to the lead member of staff and/or take advice from Social Care if unable to speak to the DSL/DDSL.</p> <p>The DSL will be given the time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters:</p> <ul style="list-style-type: none"> <li>• Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.</li> <li>• Contribute to the assessment of children; refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.</li> <li>• Keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.</li> <li>• Link with the three local safeguarding partners and other external agencies as required. In relation to the Police, this will include consideration for <a href="#">‘When to call the Police’</a>. This includes involvement in discussions about early help provision.</li> <li>• Take lead responsibility for promoting educational outcomes for social-worker children (SWC) by knowing their safeguarding concerns and the impact these might have on attendance, engagement, and achievement – Jointly with the Designated Teacher, the DSL will also ensure that the academy adheres to the E-ACT SWC Process.</li> <li>• Safeguarding of pupils in alternative provision, with an emphasis on working with the Special Educational Needs and Disability Coordinator (SENDCO), to ensure additional pastoral support is provided for children with special educational needs and disabilities (SEND).</li> <li>• Take lead responsibility for safeguarding pupils attending alternative provision including informing providers of vulnerabilities to ensure pupils are kept safe and jointly work with the SENDCO and Lead responsible for Behaviour to ensure the placement meets pupil’s needs.</li> </ul> <p>Understand the views of children – encourage a culture of listening/taking account their wishes and understanding the difficulties they may have in approaching staff about their issues.</p> <p>Share a child’s safeguarding information with the new provision within 5 days of them leaving and share in advance any additional information that is required to safeguard a child.</p> <p>Being aware of the requirement for children to have an Appropriate Adult (i.e., for Police investigations and searches). Consideration for <a href="#">PACE (Police and Criminal Evidence) Code C 2019 (Updated 2020)</a>.</p> <p>The role of DSL and Deputy DSL is explicit in the role holder’s job description.</p> |
| <p><b>Governance</b></p> | <p>The Board of Trustees and the Executive Leadership team (ELT) will approve this policy at each review. In upholding their governance function the Education Director and Trust Safeguarding Lead will hold the Headteacher to account for its implementation.</p> <p>The Trust Safeguarding Lead will ensure the academy contributes to multi-agency working in line with the DfE statutory guidance <i>Working Together to Safeguard</i></p>   |

|                    |   |
|--------------------|---|
|                    | <p><i>Children.</i> The academy must understand their role in the safeguarding partner arrangements in the local authority.</p> <p>The Trust Safeguarding Lead will monitor the effectiveness of this policy. They are responsible for liaising with the Headteacher and Designated Safeguarding Lead over all matters regarding child protection issues.</p> <p>The Trust Safeguarding Lead will liaise with the Headteacher and the Designated Safeguarding Lead, to produce an annual report for the local authority (s175/s157).</p> <p>The Education Director or delegate will act as the ‘case manager’ if an allegation of abuse is made against the Headteacher, where appropriate (refer to section 3 in the procedure manual below).</p> <p>All staff are trained in the procedures to follow if they have a safeguarding concern/allegation in relation to a regional/national member of staff.</p>  |
| <b>Headteacher</b> | <p>The Headteacher, or where appropriate her/his deputy, is responsible for the implementation of this policy, including:</p> <ul style="list-style-type: none"> <li>• Ensuring that staff (including temporary/supply staff) and volunteers are informed of this policy as part of their induction; communicating this policy to parents when their child joins the academy and via the academy website.</li> <li>• Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.</li> <li>• Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.</li> <li>• Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff, volunteer, or supply staff, where appropriate (refer to section 3 of the procedure manual below).</li> <li>• Ensuring the relevant staffing ratios are met, where applicable</li> <li>• Ensuring that each child in the Early Years Foundation Stage is assigned a key person.</li> <li>• Where academy premises are hired or rented out (e.g., to sports associations or community groups), then appropriate checks will be completed to ensure safeguarding arrangements are in place. This applies regardless of whether children who attend these services are on roll at the academy. Appropriate checks include a letter of reassurance from the organisation (including for enhanced DBS checks) and a safeguarding policy. The E-ACT lettings policy has further information and is updated with KCSIE (Keeping Children Safe in Education) requirements.</li> </ul> |
| <b>Parents</b>     | <p>Have access to Safeguarding statements, policy, and other associated documents.</p> <p>Be made aware of school’s responsibility to safeguard children.</p> <p>Understand how to access appropriate signposting for support e.g., Domestic Abuse.</p>   |

## 13. Confidentiality

The academy has a separate policy with respect to confidentiality and data protection. This includes a list of guidelines for staff to follow to avoid breaching confidentiality.

All staff must be aware that:

- Timely information sharing is essential to effective safeguarding (including withholding personal information for the purposes of keeping a child safe); whether problems are first emerging, or a child is already known to Social Care.
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm.
- Information can be shared without consent where it is not possible to gain consent or cannot be reasonably expected that a practitioner gains consent.
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Confidentiality is also addressed in this policy with respect to allegations of abuse against staff in section 3 of the procedure manual below.

### Record Keeping

We will hold records in line with our E-ACT Information and Records Retention Policy and data protection legislation.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. Staff can choose to upload a hand-written record on CPOMS if required. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Any safeguarding logs including child protection are recorded securely on CPOMS and will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- Notes of any action taken, and decisions reached (including a rationale/justification for these decisions as appropriate).

In the circumstance that CPOMS is not working effectively, the back-up process will be initiated:

- Inform CPOMS (CPOMS: 08453451155 or helpdesk@cpoms.co.uk)/ IT/Trust Safeguarding Lead so that they can address the issue
- Trust Safeguarding Lead to inform National Director of Inclusion/Deputy CEO/National IT Security Manager
- Inform safeguarding team and academy staff that back-up system is initiated
- Implement either (a) paper concern template (b) secure OneDrive template  
*NOTE: Urgent concerns must be reported to the safeguarding team in person*
- The safeguarding team will increase ad hoc meetings to discuss new concerns in the context of historical information given that CPOMS will not be a source for this
- When CPOMS is fixed all information for the following categories must be transferred (either scanned or inputted as a new incident and backdated) as a priority (1 week) with all other categories transferred within 1 half-term:
  - All 'Red' categories: Safeguarding, CCA, Positive Handling

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the academy. All safeguarding records are stored on CPOMS. There are historic paper records still held within the academy that are used when required. The Trust has a separate policy that provides additional information for how long the records are held. This is in our E-ACT Information and Records Retention Policy. The academy will share information with other agencies and when this is appropriate, in line with local safeguarding procedures.

## 14. Mobile phones and cameras

In the EYFS and in primary academies, no member of staff may use their own tablet, phone, or other device to take photographs whilst children are present. Academy tablets, phones, devices may only be used in the main classroom area (not toilets or changing rooms or where children are changing their clothes) during work time when they may want a record of a child's learning for assessment purposes.

Staff are allowed to bring their personal phones to the academy for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. This includes at performance events. Headteachers and other key roles will be provided with an E-ACT mobile device. We will follow the General Data Protection Regulation which formed the Data Protection Act 2018 when taking and storing photos and recordings for use in the academy.

## 15. Monitoring and compliance

This policy will be monitored by the National Director of Inclusion and Trust Safeguarding Leads and through regular meetings with the CEO (Chief Executive Officer). Compliance will be assured through the abovementioned staff.

Full access is in place for each Academy CPOMS and Academy Safeguarding SharePoint. Together with this, the E-ACT half termly data and E-ACT Power BI Assembly Pro provides timely data to further assess compliance. This will supplement on-site and remote visits including through Governance review days and Assurance Reviews.

This policy will be reviewed annually. At every review, it will be approved by the Executive Leadership Team (ELT) and the full governing board of the Trust, the Board of Trustees.

## Child Protection and Safeguarding

### PROCEDURE MANUAL

#### 1. Categories of abuse and taking action

Categories of Abuse include:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

#### Possible non-specific indicators of abuse in children

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

#### Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

**The absence of such indicators does not mean that abuse or neglect has not occurred.**

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances

- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- Parents are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries.

### Bruising

Children can have accidental bruising however, the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used e.g., belt marks, handprints, or a hairbrush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

### Mongolian Blue Spot:

Bruising in non-mobile children is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising. Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to local authority guidance and consultation.

- Areas of skin hyperpigmentation – flat, not raised, swollen, or inflamed.
- Not painful to touch.
- Usually present at birth/ develop soon afterwards.
- Will not change in shape or colour within a few days.
- Normally uniform blue/ grey in colour across the mark
- Common in African, Middle Eastern, Mediterranean, and Asian children
- While most occur at the lower back and buttocks, they can appear anywhere (e.g., back of shoulder or limb). Scalp/ face rarely affected.
- Can be single/ multiple, vary in size, but mostly few centimetres diameter.
- Gradually fade over many years

### **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

### **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion.

Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement.
- There is an unexplained fracture in the first year of life.

### **Scars**

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

### **Some indicators of emotional abuse:**

- Developmental delay
- Abnormal attachment between a child and parent e.g., anxious, indiscriminate, or not attachment
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others
- Scapegoated within the family.
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or difficulty relating to others

### Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear.

This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

#### **Behavioural indicators could include:**

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)

#### **Physical indicators could include:**

- Pain or itching in genital area.
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia, or clothing

### Recognising Neglect

Evidence of neglect is built up over time and can cover different aspects of parenting.

#### **Indicators include:**

- Persistent failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene, and medical care.
- Child seen to be listless, apathetic, and irresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment.
- Child is frequently absent from school.
- Child is left with adults who are intoxicated or violent.
- Child is abandoned or left alone for excessive periods

**IF A CHILD IS IN IMMEDIATE DANGER**

| Taking Action |   |
|---------------|---|
| <b>Staff</b>  | <p><b>Make a referral to children’s social care and/or the Police immediately.</b><br/>Anyone can make a referral.</p> <p>Tell the Designated Safeguarding Lead (DSL) and log on CPOMS as soon as possible if you make a referral directly.</p> <p>Details of how to make a referral are also included in the academy local circumstances in section 6 of the procedure manual below.</p>   |
| <b>DSL</b>    | <p>Work in partnership with other agencies in the best interests of the children. Where necessary, liaise with the Police, any relevant external agency including GP (General Practitioner), school nurse, and make a referral to children’s social care.</p> <p>Where the child already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence to their team manager and log on CPOMS.</p> <p>The following link provides additional guidance for reporting child abuse to your local council: <a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a></p> |

**Managing disclosures**

We recognise that children may not feel ready to disclose their abuse, neglect or exploitation, and that they may not recognise their experiences as harmful. This could be because of a range of factors such as embarrassment, coercion, or vulnerability (such as SEND (Special Educational Needs and Disabilities), sexual orientation or language barriers).

All staff will work towards building positive and trusted relationships with children that facilitate communication and show professional curiosity that will provide opportunities for disclosure. Additional pastoral support (and appropriate support for communication in relation to children with SEND) will be considered.

We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty, or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

A child who makes a disclosure may have to tell their story on several subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

**The tables below outline the steps that must be followed if a child makes a disclosure:**

| During their conversation with the pupil staff will;   |
|--|
| <ul style="list-style-type: none"> <li>• listen to what the child has to say and allow them to speak freely.</li> <li>• remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener.</li> <li>• reassure the child that it is not their fault and that they have done the right thing in telling someone.</li> <li>• not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk.</li> <li>• take what the child is disclosing seriously.</li> </ul> |

- ask open questions and avoid asking leading questions.
- avoid jumping to conclusions, speculation or make accusations.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- avoid admonishing the child for not disclosing sooner. Saying things such as ‘I do wish you had told me about it when it started’ (this may be the staff member’s way of being supportive but may be interpreted by the child to mean they have done something wrong).
- tell the child what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.
- record on CPOMS the conversation as soon as possible in the child’s own words. Stick to the facts and do not make your own judgement on it. The record must include dates and times to ensure there is an accurate record; alternatively, if appropriate and there is immediate risk of harm, make a referral to children’s social care and/or the Police directly, and tell the DSL as soon as possible.

### Notifying Parents

- The academy will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and normally the DSL/DDSL will contact the parent in the event of a concern, suspicion, or disclosure of abuse of that the child has been harmed in some way.
- However, if the academy believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the children’s Local Authority Safeguarding Hub.
- Where there are concerns about forced marriage or so-called honour-based abuse, parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.
- Any meetings with parents that relate to safeguarding (including pastoral meetings for attendance/behaviour/wellbeing) will be recorded on CPOMS.

### Making a referral

- Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to the children’s Local Authority Safeguarding Hub or other support is appropriate in accordance with The Local Authority Threshold Tool. This then needs to be logged on CPOMS asap.
- If schools are uncertain about whether a concern raised should be referred to the Local Authority Safeguarding Hub, a consultation will be sought with the Local Authority to seek further support and guidance and advice logged on CPOMS.
- If a referral is needed, the DSL should make this rapidly and have the necessary systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one has not been made, they can, and should, consider making a referral themselves then logged on CPOMS asap.
- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child, rationale for both needs to be logged on CPOMS asap.

- If after a referral the child's situation does not appear to be improving, the designated safeguarding lead should request re-consideration, to ensure their concerns have been addressed, and most importantly the child's situation improves.
- Where a referral has not made by the DSL, the DSL should be informed, and information logged on CPOMS asap.
- The following link provides additional guidance for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>.

### Supporting Staff

We will support such staff by providing an opportunity to talk through any concerns with the DSLs and to seek further support as appropriate.

We recognise that staff working in our Academy who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

## 2. Types of abuse and additional vulnerabilities

### Female Genital Mutilation (FGM)

So-called honour-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. These are detailed below.

*Keeping Children Safe in Education* explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs” We recognise that FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting,’ ‘circumcision’ or ‘initiation.’

Section 6(1) of the FGM ACT 2003 states that ‘girl includes woman’. In line with the Scope item 3.2 in this policy, our duty does extend to all girls within our duty of care and reporting must also be in line with local safeguarding arrangements for child protection.

#### Possible indicators that a pupil may be at risk of FGM

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- Unexpected holiday abroad and rumours of surgery, rituals, or traditions abroad; having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society; confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from school or visiting a surgeon from another country who is visiting the UK, having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

*\*The above indicators and risk factors are not intended to be exhaustive.*

#### Indicators that FGM has already occurred

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- Having unusual difficulty walking, sitting, or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems; avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour; being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem; talking about pain or discomfort between her legs

If you discover that FGM has taken place, or a pupil is at risk of FGM, the table below outlines your responsibilities based on your role in the Academy.

| Taking Action             |   |
|---------------------------|---|
| Teacher                   | <p><b>Any teacher</b> who discovers that an act of FGM appears to have been carried out on a pupil under 18, must immediately report this to the Police, personally then log on CPOMS and inform DSL asap.</p> <p><b>This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.</b></p> <p>This does not apply in cases where a pupil is <i>at risk</i> of FGM or FGM is suspected but is not known to have been carried out. Staff must inform the DSL if they have any concerns that a pupil may be having FGM surgery in the future in the UK but also abroad. Staff must not examine pupils.</p> |
| Any other member of staff | Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow the Academy local safeguarding procedures as outlined in section 6 of the procedure manual below.  |
| DSL                       | The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.  |

#### Extremism and Radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Pupils may become susceptible to radicalisation through a range of social, personal, and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. **It is vital that school staff can recognise those vulnerabilities.**

The government website Educate Against Hate <https://educateagainsthate.com/> and charity NSPCC says that signs that a pupil is being radicalised can include:

| Possible indicators that a child is being radicalised |   |
|---|---|
|   | <ul style="list-style-type: none"> <li>• Refusal to engage with, or becoming abusive to, children who are different from themselves</li> <li>• Becoming susceptible to conspiracy theories and feelings of persecution</li> <li>• Changes in friendship groups and appearance</li> <li>• Rejecting activities, they used to enjoy</li> <li>• Converting to a new religion</li> <li>• Isolating themselves from family and friends</li> <li>• Talking as if from a scripted speech</li> <li>• An unwillingness or inability to discuss their views</li> <li>• A sudden disrespectful attitude towards others</li> <li>• Increased levels of anger</li> <li>• Increased secretiveness, especially around internet use</li> <li>• Expressions of sympathy for extremist ideologies and groups, or justification of their actions</li> <li>• Accessing extremist material online, including via social media platforms</li> <li>• Possessing extremist literature</li> <li>• Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations</li> </ul> |

The Department for Education (DfE) also has a dedicated telephone helpline, 020 7340 7264, that academy staff and regional teams can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

We recognise that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alerted to changes in pupils' behaviour.

| Taking Action |   |
|---------------|---|
| <b>Staff</b>  | <p>Academies have a duty to prevent children from being drawn into terrorism.</p> <p>If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to the local authority children's social care directly if appropriate (see 'Referral' above).</p> <p>In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:</p> <ul style="list-style-type: none"> <li>• Think someone is in immediate danger</li> <li>• Think someone may be planning to travel to join an extremist group</li> <li>• See or hear something that may be terrorist related.</li> </ul> |

|         |  |
|---------|--|
|         | <p>Recognise that children who are susceptible to radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour, staff should have confidence in their instincts and seek advice if something feels wrong.</p> <p><b>Staff must always take action if they are worried and log on CPOMS</b></p>   |
| DSL     | <p>The DSL will undertake Prevent awareness training and make sure that all staff have access to appropriate training to equip them to identify children at risk.</p> <p>Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral. This could include <a href="#">Channel</a>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.</p> <p>If there are concerns that the child is at risk of harm, then a referral must be made to children's social care regardless of whether a Channel referral is deemed appropriate.</p> <p>The DSL will undertake a Prevent Risk Assessment annually for their Academy <a href="#">Prevent duty: risk assessment templates - GOV.UK (www.gov.uk)</a>.</p> |
| Academy | <p>The academy will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at the academy and at home.</p>   |

### Forced Marriage

Forcing a person to purposefully cause a child to marry before the age of 18 is a crime, even without violence or coercion. This applies to both legal and non-binding 'marriages.

A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological and can come from parents and other family members or elders in a particular religion.

| Taking Action |  |
|---------------|--|
| Staff         | <p>Staff will receive training around forced marriage and the presenting symptoms.</p> <p>Be aware of the 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place.</p> <p>Recognise that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.</p> <p>Report concerns to the DSL and log on CPOMS.</p> |
| DSL           | <p>Speak to the pupil about the concerns in a secure and private place.</p> <p>Activate the local safeguarding procedures and refer the case to the local authority's designated officer.</p> <p>Seek advice from the Forced Marriage Unit on 020 7008 0151 or <a href="mailto:fm@fco.gov.uk">fm@fco.gov.uk</a>. Refer to Government guidance on 'The right to choose'.</p>  |

### Breast Ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa. Further information in relation to breast ironing can be found at [www.nationalfgmcentre.org.uk](http://www.nationalfgmcentre.org.uk).

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence.

| Taking Action |   |
|---------------|---|
| Staff         | Staff worried about the risk of breast ironing in their academy should speak to the Designated Safeguarding Lead as soon as possible and log concerns on CPOMS. |

### Serious Youth Violence

As included in *Keeping Children Safe in Education*, all staff should be aware of indicators, which may signal children are at risk from or are involved with serious violent crime. Possible indicators are outlined in the table below:

| Possible indicators that a child is involved with serious violence   |
|--|
| <ul style="list-style-type: none"> <li>• increased absence from school</li> <li>• a change in friendships or relationships with older individuals or groups</li> <li>• a significant decline in performance</li> <li>• signs of self-harm or significant change in well-being</li> <li>• signs of assault or unexplained injuries</li> <li>• unexplained gifts or new possessions</li> <li>• exclusions or being permanently excluded</li> <li>• having experienced maltreatment</li> <li>• been involved in offending (i.e., robbery or theft)</li> <li>• Being male</li> </ul> <p><i>These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.</i></p> |

| Taking Action |   |
|---------------|---|
| Staff         | <p>All staff should be aware of the associated risks and understand the measures in place to manage these.</p> <p>Further advice can be provided in the Home Office's 2018 guidance documents: <i>Preventing Youth Violence and Gang Involvement</i> and <i>Criminal exploitation of children and vulnerable adults: county lines guidance</i>.</p> <p>Report concerns to the DSL and log on CPOMS.</p> |

### Child Exploitation

Child exploitation is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual (CSE) or criminal (CCE) activity.

Child sexual exploitation (CSE) is where children are sexually exploited for money, power, or status. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online.

For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE is a form of child sexual abuse.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

Child criminal exploitation (CCE) is where children are used to complete criminal activity (a) in exchange for something they need (i.e., food/money), (b) for the financial or other advantage of the perpetrator, or (c) through violence or the threat of violence. This can also occur using technology.

CCE can include county lines (see below), or children being forced to work in cannabis factories, forced to shoplift or pickpocket or to threaten other young people.

County lines is a form of CCE that refers to gangs or organised criminal networks exploiting children to transport illegal drugs/drug money into one or more importing areas (within the UK) using 'deal lines' (dedicated mobile phone lines). Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. It is acknowledged that experiences of girls and boys in relation to CCE can be different, but both can exist and where this is the case, there is a higher risk of CSE.

| Possible indicators that a child is being exploited   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Appearing with unexplained gifts or new possessions</li> <li>• Associating with other young people involved in exploitation</li> <li>• Having older boyfriends or girlfriends</li> <li>• Suffering from sexually transmitted infections or becoming pregnant</li> <li>• Displaying inappropriate sexualised behaviour</li> <li>• Suffering from changes in emotional wellbeing</li> <li>• Misusing drugs and/or alcohol</li> <li>• Going missing for periods of time, or regularly coming home late</li> <li>• Regularly missing school or education, or not taking part in education</li> </ul> |  |

| Taking Action |   |
|---------------|---|
| <b>Staff</b>  | If a member of staff suspects CSE or CCE, discuss this with the DSL and record concerns on CPOMS.   |
| <b>DSL</b>    | The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the Police, if appropriate. |

### Children and the Court System

Children on occasions are required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support

children 5-11 year olds and 12-17 year olds. These can be found on page 151 of Keeping Children Safe in Education (September 24)

Parental separation can also lead to making child arrangements via the family courts following separation. This can be stressful and cause conflict in families and be stressful for children. An online child arrangements information tool with clear and concise information on the dispute resolution service is available for parents/carers to access. This can be found on page 151 of Keeping Children Safe in Education (September 24).

### Domestic Abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are personally connected. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

| Taking Action |   |
|---------------|---|
| Staff         | <p>Be aware that all children can see, hear, or experience domestic abuse in the context of their home life. They are therefore victims in their own right.</p> <p>Be aware that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.</p> <p>Be aware that in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Therefore, abuse can include the impact of witnessing the ill-treatment of others.</p> <p>Be aware of <a href="#">The Domestic Abuse Act 2021</a> that received royal assent on 29 April 2021.</p> <p>If a member of staff suspects domestic abuse, discuss this with the DSL and record concerns</p> |
| DSL           | The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the Police, if appropriate  |

### Online Safety

Technology is a significant component of safeguarding issues and abuse can take place concurrently online and in daily life.

Online safety is an ongoing and interrelated theme that informs other policy and systems/processes.

The prevalence of issues arising through children's access to the online world is significant and all staff should be aware of associated risks and signs/symptoms. These are categorised within Keeping Children Safe in Education as:

- Content
- Contact
- Conduct
- Commerce

Online safety includes non-age-appropriate content, self-harm, and suicide, sharing nudes or semi-nudes, cyberbullying, grooming, radicalisation, gaming (now identified by the World Health Organisation as a disorder), online gambling, inappropriate advertising, harmful online challenges/hoaxes and cybercrime. Our pupils will receive sessions to ensure they are aware of the risks associated above and how to report any concerns.

Specific reference to safeguarding in relation to access online can be found in the Trust's Online Safety Policy.

| Taking Action  |   |
|----------------|---|
| <b>Staff</b>   | Staff will receive annual training around online safety including the signs/symptoms for the content, contact, conduct and commerce as mentioned above, as well as signposting to support available to students to build their online resilience. Staff will also work with parents/carers to reinforce the importance of children being safe online and how to support them to achieve this. |
| <b>Academy</b> | Follow advice from the DfE in relation to online safety if children are asked to learn online from home.<br><br>Academies will complete an annual review/risk assessment of their online safety provision to ensure continued good practice.  |

### Misinformation and Disinformation (Online Safety)

As part of our commitment to safeguarding and promoting the welfare of all pupils, the Trust recognises the growing risks posed by misinformation and disinformation online. In line with KCSIE 2025, these risks are categorised under the “content” strand of online safety and refer to:

**Misinformation:** False or inaccurate information shared without harmful intent.

**Disinformation:** Deliberately misleading or manipulated content intended to cause harm or influence behaviour.

The Trust is committed to:

- Embedding digital literacy and critical thinking into the curriculum to help pupils identify and challenge false or misleading information.
- Providing staff training to recognise and respond to the impact of misinformation/disinformation on pupil wellbeing, safety, and behaviour.
- Ensuring that filtering and monitoring systems are in place to reduce exposure to harmful online content.
- Promoting safe, responsible, and respectful online behaviour through our curriculum.

This approach supports our wider safeguarding strategy and ensures pupils are equipped to navigate the digital world safely and responsibly.

### Use of Emerging Technologies and Generative AI

In line with Keeping Children Safe in Education (KCSIE) 2025, the Trust recognises the safeguarding implications of emerging technologies, including the use of Generative Artificial Intelligence (AI) in educational settings.

The Department for Education has published Generative AI: Product Safety Expectations, which outlines how filtering and monitoring requirements apply to AI tools used in schools. Academy staff can access this guidance here: [Generative AI: product safety expectations- GOV.UK](#)

The Trust is committed to:

- Ensuring that any AI tools or platforms used by staff or pupils are assessed for safety, appropriateness, and compliance with DfE expectations.
- Working with IT leads to implement effective filtering and monitoring systems that cover AI-generated content.
- Providing training and guidance to staff on the safe and ethical use of AI in the classroom.
- Embedding digital literacy and critical thinking into the curriculum to help pupils understand and navigate AI-generated content responsibly.

The Trust will regularly review its use of AI technologies and ensure that safeguarding remains central to all decisions involving digital tools and platforms.

### Filtering and Monitoring

Keeping Children Safe in Education requires schools and colleges in England to ‘*ensure appropriate filters and appropriate monitoring systems are in place.*’ There is additional guidance how to teach pupils to be safe online on the DfE guidance.

Children should not be able to access harmful or inappropriate material from the academy’s IT system” however, academies will need to “be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.”

We recognise that no filter can be guaranteed to be 100% effective. The Headteacher along with the Regional Operations Director, will check that the academy is satisfied that their filtering system manages the following content (and web search).

| Taking Action     |   |
|-------------------|---|
| <b>DSL</b>        | It is the role of the DSL to lead, and take responsibility, for filtering and monitoring in the academy.<br><br>Ensure that Safeguarding and Child Protection training for staff, including Governors includes filtering and monitoring requirements and their role in it.  |
| <b>Staff</b>      | Understand the importance of filtering and monitoring in the academy.<br>Undertake mandatory training requirements.   |
| <b>Academy</b>    | The academy will meet the <a href="#">Cyber security standards</a> as outlined in the Government guidance ‘ <a href="#">meeting digital and technology standards in schools and colleges</a> ’. These technical and filtering requirements, alongside filtering principles, are outlined in the tables below.<br><br>The academy makes sure that the content is age appropriate and includes the ability to implement variable monitoring appropriate to age. The system includes the capability to monitor personal mobiles and app technologies (i.e., not owned by the school), ensure it is deployed and supported and how data is managed.<br><br>Filtering and Monitoring systems will be reviewed annually by SLT (Senior Leadership Team), and Governors and reviews will be recorded with evidence of actions taken. |
| <b>Governance</b> | Governance training will include an understanding of filtering and monitoring in the academy and should review the standards with IT staff and service providers.   |
| <b>Trust</b>      | The trust will use filtering and monitoring results to inform policy and practice and will regularly review their effectiveness. All users are made aware that their online access is being monitored via staff training, staff handbooks, assemblies to pupils and computing lessons.  |

### Technical requirements to meet the cyber security standards

- Protect every device with a correctly configured boundary, or software firewall, or a device that performs the same function
- Change the default administrator password, or disable remote access on each firewall

- Protect access to the firewall’s administrative interface with multi-factor authentication (MFA), or a small, specified IP-allow list combined with a managed password, or prevent access from the internet entirely
- Keep firewall firmware up to date
- Check monitoring logs as they can be useful in detecting suspicious activity
- Block inbound unauthenticated connections by default
- Document reasons why particular inbound traffic has been permitted through the firewall
- Review reasons why particular inbound traffic has been permitted through the firewall often, change the rules when access is no longer needed
- Enable a software firewall for devices used on untrusted networks, like public wi-fi

#### The filtering will have regard to

- Discrimination – a web search that promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, sexuality, gender identity, disability; drugs/substance abuse - displays or promotes the illegal use of drugs or substances
- Extremism - promotes terrorism and terrorist ideologies, violence, or intolerance; malware/hacking- promotes the compromising of systems including anonymous browsing and other filter bypass tools as well as sites hosting malicious content
- Pornography- displays sexual acts or explicit images; piracy and copyright theft- includes illegal provision of copyrighted material
- Self-harm- promotes or displays deliberate self-harm (including suicide and eating disorders); violence- displays or promotes the use of physical force intended to hurt or kill.

#### The filtering system meets the following principles

- Age appropriate, differentiated filtering – includes the ability to vary filtering strength appropriate to age and role; has the ability and ease of use that allows academies to control the filter themselves to permit or deny access to specific content
- The filtering provider publishes a rationale that details their approach to filtering with classification and categorisation as well as over blocking
- The filtering system can identify users
- Mobile and App content – mobile and app content is often delivered in entirely different mechanisms from that delivered through a traditional web browser. To what extent does the filter system block inappropriate content via mobile and app technologies (beyond typical web browser delivered content);
- Multiple language support – the ability for the system to manage relevant languages. Network level filtering should be applied at ‘network level’ i.e., not reliant on any software on user devices
- Reporting mechanism – the ability to report inappropriate content for access or blocking. Reports – the system offers clear historical information on the websites visited by users.

We recognise that no monitoring can guarantee 100% effectiveness however will make sure that there are appropriate monitoring systems in place. The following table outlines what material will be checked for:

### Monitoring systems will check for the following

- Content that is illegal, for example child abuse images and terrorist content
- The repeated use of force, threat, or coercion to abuse, intimidate or aggressively dominate others
- Encouraging the child into a coercive/manipulative sexual relationship. This may include encouragement to meet
- Promotes the unjust or prejudicial treatment of people on the grounds of race, religion, age, sex, sexuality, disability, or gender identity
- Displays or promotes the illegal use of drugs or substances
- Promotes terrorism and terrorist ideologies, violence, or intolerance
- Displays sexual acts or explicit images
- Promotes or displays deliberate self-harm; promotes the use of physical force intended to hurt or kill; suggest the user is considering suicide.

### Mental Health

Supporting all children's mental health is a key priority for the academy (and is specifically included within the Keeping Children Safe in Education definition of 'safeguarding'). This includes preventing/acting on abuse caused by impairment of a child's mental health or development.

Poor mental health is an indicator of potential harm and potential adverse childhood experiences. Training for staff will include being aware of this link.

### Taking Action

|              |   |
|--------------|---|
| <b>DSL</b>   | Ensure that all staff are trained in the signs/symptoms of poor mental health and will record their concerns on CPOMS using the mental health category.<br><br>Ensure staff are aware of their responsibility of informing the DSL immediately if they perceive that the child is at risk of harm (including through self-harm or suicide). |
| <b>Staff</b> | Where staff have a mental health concern for a child where there are also safeguarding concerns then immediate action will be taken including the DSL liaising with the senior mental health lead.  |

Specific reference to safeguarding in relation to mental health can be found in the Trust's Pupil Mental Health and Wellbeing Policy.

### Extra-Familial Harms / Contextual Safeguarding

Safeguarding concerns can be associated with factors outside the home environment and all staff (but especially safeguarding teams) should be aware of the context that such concerns can occur. This includes issues that arise in an academy, between children, within the local community or online.

Children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. We recognise that children and young people's risk experiencing significant harm in extra-familial contexts, and seek to include these contexts within prevention, identification, assessment, and intervention safeguarding activities.

| Taking Action |  |
|---------------|--|
| <b>DSL</b>    | <p>Ensure that all staff are trained in the signs/symptoms of extra-familial Harms and will record their concerns and actions taken on CPOMS.</p> <p>Ensure staff are aware of their responsibility of informing the DSL immediately if they perceive that the child is at risk of harm.</p> <p>DSL along with the Headteacher will continually assess the risks that young people may be exposed to, both inside and outside of the academy community.</p> <p>The DSL will consider all potential harms when assessing the risk to a pupil.</p> |
| <b>Staff</b>  | All staff need to consider the location and culture of their academy. Where staff concerns for a child immediate action will be taken including the DSL and recording concerns on CPOMS.   |

### Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority.

Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. The academy will make it clear who has parental responsibility.

### Children in Kinship Care and the Role of the Virtual School Head

In line with Keeping Children Safe in Education (KCSIE) 2025, the Trust recognises that children in kinship care arrangements may face additional vulnerabilities and barriers to educational achievement.

The role of the Virtual School Head (VSH) has been extended to include a non-statutory responsibility to promote the educational outcomes of children in kinship care. The Trust will:

- Work in partnership with the VSH to ensure that children in kinship care are identified and supported.
- Ensure that Designated Safeguarding Leads (DSLs) are aware of the needs of children in kinship care and liaise with the VSH where appropriate.
- Monitor the progress, attendance, and wellbeing of children in kinship care as part of our wider safeguarding and inclusion strategy.

This approach supports our commitment to ensuring that all children, regardless of their care arrangements, have access to a safe, inclusive, and supportive learning environment.

| Taking Action |  |
|---------------|--|
| <b>Staff</b>  | Be aware that the academy has a mandatory duty to report to the local authority, where they are aware or suspect that a child is subject to a private fostering arrangement. |

|                |   |
|----------------|---|
|                | <p>Staff will notify the DSL when they become aware of private fostering arrangements.</p> <p>Staff will be aware about the vulnerabilities of children in kinship care and the extended role of the VSH.</p>   |
| <b>DSL</b>     | <p>Speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority.</p> <p>Identify children in kinship care and record their status accurately in school systems.</p> <p>Raise awareness among staff about the vulnerabilities of children in kinship care and the extended role of the VSH.</p> <p>Liaise with the Virtual School Head to coordinate support and share relevant information.</p> <p>Monitor progress, attendance, and wellbeing of children in kinship care as part of safeguarding oversight.</p> <p>Provide targeted support (pastoral, academic, emotional) to meet individual needs.</p> <p>Include kinship care in safeguarding training, briefings, and pupil vulnerability reviews.</p> |
| <b>Academy</b> | <p>On admission to the academy, we will take steps to verify the relationship of the adults to the child who is being registered.</p>   |

### Elective Home Education

Parents have a right to educate their children at home (Section 7 of the Education Act 1996) and may elect to home educate at any stage up to the end of compulsory school age. This is a personal decision that the academy should not be influencing or suggesting.

Parents are not required to register or seek approval to educate their children at home (except children on roll of a special school), however, they are required to give written notification of their intention to home educate to the school so their child can be deleted from the academy roll. If a child is registered at the academy because of a school attendance order the parents must get the order revoked (by the local authority) by providing evidence of a suitable education before the child can be de-registered.

If there are safeguarding concerns about the child being home educated:

| Taking Action |   |
|---------------|---|
| <b>DSL</b>    | <p>This information must be reported to the Local Authority and a referral to the local authority's children's social care team if concerns are significant. The DSL should follow the Local Authority processes for informing them of a parent's decision to home educate.</p> <p>Depending on the age of the child, the designated safeguarding lead should speak to them alone about how they feel about being educated at home and whether they have any concerns. This should be recorded and reported to the Local Authority.</p> |

### Pupil awareness

All pupils will receive an age-appropriate personal development curriculum that ensures they are provided with effective information, support, and signposting for all safeguarding areas. This includes delivery through the statutory RSHE guidance.

Pupils will be taught about relevant risks, appropriate behaviour and how to report concerns. Examples from Keeping Children Safe in Education are outlined in the table below:

| Pupils should be aware of |   |
|---------------------------|---|
|                           | <ul style="list-style-type: none"> <li>• sexism</li> <li>• misogyny/misandry</li> <li>• homophobia</li> <li>• biphobia</li> <li>• sexual violence/harassment</li> <li>• healthy and respectful relationships</li> <li>• boundaries and consent</li> <li>• stereotyping</li> <li>• prejudice and equality</li> <li>• body confidence and self-esteem</li> <li>• how to recognise an abusive relationship (including coercive and controlling behaviour)</li> <li>• the concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM)</li> <li>• what constitutes sexual harassment and sexual violence and why these are always unacceptable together with sensitively reinforcing that the law is in place to protect children and young people rather than criminalise them</li> </ul> |

Where external visitors are utilised to provide information and advice on site at an academy, appropriate checks will be completed to ensure that the visitor/organisation: Is who they say they are (i.e. ID checks/website checks/reviews), will be of benefit from an education perspective, is age-appropriate, that the content is neutral from political views, that there is no attempt to coerce/manipulate/radicalise and that they are clear on your safeguarding expectations (through sharing the academy safeguarding information) including confirming they have read and understood Keeping Children Safe in Education Annex A.

A useful guide can also be found from [‘Using external visitors to support online safety education’](#).

**Child Abduction/Community Safety/Modern Slavery**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

| Taking Action |  |
|---------------|--|
| <b>Staff</b>  | <p>Work with pupils will be focused, at an age-appropriate level, on practical advice for staying safe together with building confidence and resilience.</p> <p>Be aware of the signs and systems which can include:</p> <ul style="list-style-type: none"> <li>• Parents unable to leave work to attend meetings</li> </ul> |

|     |   |
|-----|---|
|     | <ul style="list-style-type: none"> <li>• subjected to violence or threats</li> <li>• unexplained injuries</li> <li>• concerns over identity or other relevant documentation</li> <li>• being in a situation of dependence or perception of being bonded by debt</li> <li>• receiving little or no payment.</li> </ul> <p>Staff should record concerns and report any concerns to the DSL.</p> |
| DSL | <p>Ensure staff receive awareness training about this type of abuse.</p> <p>If deemed appropriate, complete a referral to the National Referral Mechanism (NRM) when there are concerns about a child in relation to modern slavery.</p>  |

### 3. Safeguarding concerns or allegations of abuse

#### Concerns about a staff member, volunteer, or supply staff

If there is a safeguarding concern or allegation about a member of staff, this should be addressed in line with Part 4 of Keeping Children Safe in Education. Information in relation to the harm test is provided in Part 4 through a link to '[Making barring referrals to the DBS](#)'.

We will deal with any allegation of abuse against a member of staff, volunteer, or supply staff very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and fair judgement.

NOTE: Abuse can be reported no matter how long ago it happened.

For use of reasonable force, please refer to the E-ACT pupil behaviour policy.

| Taking Action     |   |
|-------------------|---|
| Staff             | <p>Staff must comply with the requirements of the Department for Education (DfE) Teachers' Standards:<br/> <a href="https://www.gov.uk/government/publications/teachers-standards">https://www.gov.uk/government/publications/teachers-standards</a></p> <p>Staff must comply with the Trust's staff Code of Conduct. Members of staff should recognise the <a href="#">Guidance for Safer Working practice for Adults who work with Children and Young People in Education (2019)</a>.</p> <p>In line with the Trust's Whistleblowing Policy, if you have concerns about a member of staff, volunteer, or supply staff, speak to the Headteacher. If you have concerns about the Headteacher, speak to the Education Director. You can also discuss any safeguarding procedural concerns with the DSL.</p> |
| DSL / Headteacher | <p>Once a concern has been reported, the Headteacher (or Education Director if concerns are about the Headteacher) will determine if the member of staff has:</p> <ul style="list-style-type: none"> <li>• Behaved in a way that has harmed a child, or may have harmed a child, or</li> <li>• Possibly committed a criminal offence against or related to a child, or</li> <li>• Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.</li> <li>• Behaved or may have behaved in a way that indicates they may not be suitable to work with children</li> </ul>   |

|  |  |
|--|--|
|  | <p>The final bullet point refers to ‘transferable risk’ from a staff member who is involved in an incident outside of school that does not involve children i.e., a member of staff who is involved in perpetrating domestic abuse at home and it is determined that a child could trigger the same reaction and would thus be put at risk.</p> <p>It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the Police/LADO and the academy will support any investigations in full.</p> <p><b>If the allegation meets this threshold, the procedure for managing this is outlined below.</b></p> <p><b>In relation to allegations against supply staff:</b><br/>         Keeping Children Safe in Education states ‘the school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO (Local Authority Designated Officer) as part of the referral process’. Therefore, the academy will act as lead professional for these allegations and communicate regularly with the LADO and supply agency. Supply agencies will be informed of the academy process for managing allegations.</p> <p>In the primary, and where appropriate, the secondary academies, the academy will inform Ofsted of the allegation and actions taken, particularly if the child is below compulsory school age or within the EYFS (Early Years Foundation Stage), within the necessary timescale see 3.1.7 below.</p> |
|--|--|

**Procedure for dealing with allegations that meet the harm threshold**

When an allegation is made, a case manager will be allocated. If the allegation relates to a member of staff, the case manager will be the headteacher. If the allegation relates to the headteacher, the Education Director will be the allocated case manager.

| Role                | Responsibility  |
|---------------------|---|
| <b>Case Manager</b> | <p>Immediately ensure any children and staff involved in the allegation are safe and ensure any actions do not jeopardise any potential Police investigation. Immediately discuss the allegation with the designated officer at the local authority.</p> <p>Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the Police or children’s social care services, where necessary).</p> <p>Where the Police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.</p> <p>Where appropriate, carefully consider whether suspension of the individual from contact with children at the academy is justified, or whether alternative arrangements should be agreed. Advice will be sought from the designated officer, Police, and/or children’s social care services, as appropriate.</p> |

|              |   |
|--------------|---|
|              | <p><b>If immediate suspension is considered necessary</b>, consult with HR (Human Resource), and agree and record the rationale for this with the designated officer.</p> <p>The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within one working day, and the individual will be given a named contact at the academy and their contact details.</p> <p><b>Further information about suspension can be found below</b></p>  |
| Case Manager | <p><b>If it is decided that no further action is to be taken</b> record this decision, and the justification for it, and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation. This may sometimes result in further action being taken if there are concerns regarding the conduct of the member of staff.</p> <p><b>If it is decided that further action is needed</b>, take steps as agreed with the designated officer to initiate the appropriate action in the academy and/or liaise with the Police and/or children’s social care services as appropriate. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. The trust provides external and confidential support for all employees ‘Employer Assistance Programme.’ The contact number is 0800 0305182.</p>  |
| Case Manager | <p>Inform the parents of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the Police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.</p> <p>Keep the parents of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).</p> <p>Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.</p> <p>In the case of a member of teaching staff, the case manager must consider whether to refer the matter to the TRA (Teaching Regulation Agency) to consider prohibiting the individual from teaching.</p> <p>NOTE: If the academy is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by Teaching Regulation Authority (TRA).</p> |
| Case Manager | <p>In the Primary Academies we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the</p>   |

|                     |   |
|---------------------|---|
|                     | <p>premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations.</p> <p>This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.</p> <p>Where the Police are involved, wherever possible we will ask the Police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the academy disciplinary process, should this be required at a later point.</p>  |
| <b>Case Manager</b> | <p><b>Action following a criminal investigation or prosecution</b></p> <p>The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the Police and/or children's Social Care.</p>   |
| <b>Case Manager</b> | <p><b>Conclusion of a case where the allegation is substantiated</b></p> <p>If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.</p> <p>If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the TRA to consider prohibiting the individual from teaching.</p> |
| <b>Case Manager</b> | <p><b>Individuals returning to work after suspension</b></p> <p>If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.</p> <p>The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending the academy.</p>   |
| <b>Case Manager</b> | <p><b>Unsubstantiated or malicious allegations</b></p> <p>If an allegation is shown to be deliberately invented, or malicious, the Headteacher, or other appropriate person in the case of an allegation against the Headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the Police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.</p>   |
| <b>Case Manager</b> | <p><b>Record Keeping</b></p> <p>The case manager will maintain clear records about any case where the allegation or safeguarding concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:</p> <ul style="list-style-type: none"> <li>• A clear and comprehensive summary of the allegation or safeguarding concern</li> <li>• Details of how it was followed up and resolved</li> <li>• Notes of any action taken, and decisions reached (and justification for these, as stated above).</li> </ul>   |

|  |  |
|--|--|
|  | <p>If an allegation is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.</p> <p>The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.</p> |
|--|--|

### Suspension

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the trust.

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### Processing allegations against staff - Case Manager will be the Headteacher

If basic enquiries determine potential foundation to allegation:

- Inform LADO – Inform Education Director, Trust Safeguarding Lead, HR
- Complete LADO referral if requested by LADO – Investigation (either by Police/Social Care/internally through investigating officer (IO))
- Record outcome on [CPOMS StaffSafe](#) and shared with above professionals

If basic enquiries determine no potential foundation to allegation:

- Check to ensure allegation is not malicious and confirm conclusion to individual who raised the allegation.
- Share with Education Director, Trust Safeguarding Lead, Human Resources
- Record on [CPOMS StaffSafe](#)

### Processing allegations against Headteacher - Case Manager will be the Education Director.

If basic enquiries determine potential foundation to allegation:

- Inform National Director of Inclusion and CEO
- Inform LADO and complete LADO referral if requested by LADO
- Participate in the investigation (either by Police, Social Care, internally through investigating officer (IO))
- Record on [CPOMS StaffSafe](#) and shared with above professionals

If basic enquiries determine no potential foundation to allegation:

- Inform National Director of Inclusion and CEO
- Check to ensure allegation is not malicious
- Confirm conclusion to individual who raised the allegation – Outcome recorded on [CPOMS StaffSafe](#) and shared with National Director of Inclusion and CEO

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### **Confidentiality**

The academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, Police, and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated, or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated, or malicious.

### **Learning lessons**

After any cases where the allegations are substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

**Procedure for dealing with allegations do not meet the harms threshold (Low level concerns)**

We have an open and transparent culture where all concerns about adults are dealt with promptly and appropriately, and where all adults feel able to share their concerns. Where the harms threshold is not met, there are still concerns that can exist from: suspicion, patterns in behaviour, a ‘nagging doubt’ or incidents that are inconsistent with the staff code of conduct.

Examples of this could include:

- Being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging 1:1 with a child in a secluded area or behind a closed door
- using inappropriate sexualised/intimidating/offensive language

Whilst there is a wide spectrum here from inadvertent/thoughtless actions to those actions intended to enable abuse. It is essential that these low-level concerns are fully addressed and appropriately recorded.

| Taking Action                                   |  |
|---|--|
| <b>Staff</b>                                    | <p>Inform DSL of any safeguarding procedural concerns so that these can be checked, and appropriate action taken.</p> <p>Inform the Headteacher of any low-level concerns about staff. Headteacher to complete internal informal investigation of concerns – Headteacher to determine if management expectation letter is required (in conjunction with RSL/HR as required).</p> <p>Headteacher to record outcome on Staffsafe.</p>  |
| <b>Headteacher, Trust Safeguarding Lead, HR</b> | <p>Analyse trends for low level concerns to identify wider lessons learnt (i.e., whole academy/regional/trust-wide approach required such as additional staff training) and to ascertain if an individual member of staff poses a greater risk based on their reported low-level concerns in conjunction with other relevant information (i.e., vetting checks etc).</p> <p>Where this is the case, further formal investigation and consultation with the LADO may be required. Whilst the Headteacher is the ultimate decision maker they may wish to consult with the DSL and take a more collaborative decision-making approach.</p> <p>If in any doubt about whether the information shared as a low-level concern in fact meets the harm threshold, then the LADO should be consulted.</p> |

**Support**

Staff will receive training around the concept of low-level concerns and the process to follow to raise these concerns. Staff will be provided with the Trust’s staff code of conduct and also receive specific training around safeguarding procedures, positive handling, managing behaviour and safer working practice.

The Trust’s Whistleblowing Policy is shared with all staff so that they are clear on how to raise a concern The use of Staffsafe enables the confidential, secure, and consistent storing of all low-level concerns/allegations together with enabling analysis of trends by those with appropriate access and knowledge to do so.

**NOTE:** Low level concerns will not be referred to in a reference unless they relate to issues that would normally be included (i.e., misconduct or poor performance).

**Allegations of abuse made against other pupils (child on child abuse)**

Some examples of child-on-child abuse are included in the table below:

| Examples of child-on-child abuse  |
|---|
| <ul style="list-style-type: none"> <li>• Bullying (including cyberbullying)</li> <li>• Abuse in intimate personal relationships between children (including teenage relationship abuse)</li> <li>• Physical abuse</li> <li>• Sexual violence</li> <li>• Sexual harassment</li> <li>• Causing someone to engage in sexual activity without consent (i.e., forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party)</li> <li>• Consensual and non-consensual sharing of nudes and semi nudes</li> <li>• Upskirting</li> <li>• Initiation/hazing</li> </ul> |

We recognise that children can abuse other children and that this can happen inside or outside of school and online. This includes intra-familial harm where it is necessary to ensure appropriate support is provided to siblings. Abuse will never be tolerated or passed off as “banter” or “part of growing up.” We have a zero-tolerance approach.

Most cases of pupils hurting other pupils will be dealt with under our academy behaviour policy, but this policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced/coerced into drugs or alcohol
- Involves criminal exploitation, such as threatening other children into criminal activity
- Involves sexual exploitation, abuse, violence, or harassment

Upskirting, typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. This is a criminal offence under the Voyeurism (Offences) Act 2019 and victims can be of any gender or identification.

When referring to sexual harassment it means ‘unwanted conduct of a sexual nature’ that can occur online and offline. When sexual harassment is referenced, it is done so in the context of child-on-child sexual harassment.

Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualised environment.

The academy ‘Filtering and Monitoring’ processes ensure that any pupil who carries out child on child abuse online (through academy systems) can be identified, and action will be taken.

| Examples of sexual harassment can include  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names</li> <li>• Sexual “jokes” or taunting</li> <li>• Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes, and displaying pictures, photos, or drawings of a sexual nature</li> <li>• online sexual harassment</li> <li>• consensual (NOTE: consensual image sharing may not be abusive, but it is illegal) and non-consensual sharing of nude and semi-nude images – See also UKCIS advice on ‘Sharing nudes and semi-nudes’</li> <li>• sharing of unwanted explicit content (e.g., pornography)</li> <li>• Misogynistic messages</li> <li>• upskirting</li> <li>• Sexualised online bullying</li> <li>• Unwanted sexual comments and messages, including, on social media</li> <li>• sexual exploitation; coercion and threat</li> </ul> |  |

| Taking Action |  |
|---------------|--|
| <b>Staff</b>  | <p>Understand the importance that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and upskirting; dismissing or tolerating such behaviours risks normalising them.</p> <p>All staff will minimise the risk of child-on-child abuse by challenging any form of derogatory or sexualised language or behaviour and ensuring we are confident and trained to recognise the signs of child-on-child abuse and know how to report concerns.</p> <p>All staff need to understand that a pupil harming another child could be a sign that the pupil is being abused themselves, and that this would fall under the scope of this policy.</p> <p>If a child discloses violence or abuse to you, reassure victims that they are being taken seriously and will be supported/kept safe so that they never feel like they are creating a problem or feel ashamed for reporting. The wishes of the victim will be an important consideration.</p> <p>You must tell the DSL and record the allegation on CPOMS, but do not investigate it.</p> |
| <b>DSL</b>    | <p>Ensure all staff receive training on how to manage a disclosure as the initial response is so important given that children may find it difficult to make a direct report.</p> <p>If an allegation is made, the DSL may contact the local authority children’s social care team and follow their advice, as well as the Police if the allegation involves a potential criminal offence.</p>   |

|  |  |
|--|--|
|  | <p>The DSL will put a risk assessment and support plan into place for all children involved (including consideration for before/after school activities) – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed – considering for the time and location of the incident and any action required to make the location safer; the wellbeing of all children involved is essential and the DSL will contact specialist mental health services, if appropriate.</p> <p>Parents/carers will be informed in a timely manner (of both children) and wherever possible, children provided with an outcome for the allegation.</p> <p>The four likely scenarios for managing reports are:</p> <ul style="list-style-type: none"> <li>• manage internally (i.e., through behaviour policy)</li> <li>• Early Help referral</li> <li>• Social Care referral</li> <li>• Reporting to the Police.</li> </ul> <p>Deliberately false/malicious allegations will be considered in line with the behaviour policy.</p> |
|--|--|

**Early Help**

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children’s social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

**Referral**

If it is appropriate to refer the case to local authority children’s social care or the Police, the DSL will make the referral or support you to do so.

**If you make a referral directly, you must tell the DSL as soon as possible.**

The local authority will decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available and ensure outcomes are properly recorded.

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child’s situation improves.

If at any point the academy feels that the rationale/justification for the decisions made by social care do not ensure that the child is prevented from risk of harm, then they will escalate their concerns in line with the social care escalation policy/procedure. This must be recorded on CPOMS.

**Use of school of college premises for non-school / college activities**

**Management of allegations against a member of staff hiring the Academy premises.**

KSCIE places a duty on Academies to have procedures in place to deal with safeguarding allegations that occur when an individual or organisation is using our school premises for non-school activities for children. These activities include, for example, community groups, sports associations, or service providers that run extra-curricular activities. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that our Academy expect providers to have in place.

| Taking Action       |   |
|---------------------|---|
| DSL and Headteacher | For all services or activities taking place on our Academy premises directly under supervision of our staff, The Academy will follow all steps outlined in section 3, including informing the LADO if the concern meets the threshold of harm.  |
|                     | Where services or activities are not under the direct supervision or management of the Academy, the DSL and Headteacher will seek assurances that the individual, or organisation, has appropriate safeguarding and child protection policies and procedures in place. The Academy will ensure arrangements are in place for the individual or organisation to liaise with the DSL on safeguarding matters where appropriate. This duty applies regardless of whether children who attend any of these services or activities are on the school roll. |

**4. Safer recruitment and DBS checks**

We will record all information on the checks carried out in the academy's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

**Appointing new staff**

When appointing new staff, we will:

- Verify their identity (best practice is checking their birth certificate)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available (alongside a risk assessment and only under exceptional circumstances following authorisation) or where previous role was in regulated activity and was less than three months before appointment
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK so that any relevant events that occurred outside the UK can be considered. This could include criminal records checks for overseas applicants and a letter from the relevant professional regulating authority (seen as the certificate of professional competence). A risk assessment will be implemented if these checks are not obtainable to demonstrate alternative methods sought and other relevant evidence.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State. NOTE: Job title is not the determining factor for a 'management' position
- Ask for written information about previous full employment history and check that information is not contradictory or incomplete.
- Consider other information such as evidence of their online behaviour through social media. Candidates will be asked to confirm that their social media accounts are set to private.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

### **Regulated activity**

means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e., that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

DBS checks will be undertaken every three years. Where a member of staff is leaving the trust, a DBS will not be renewed if it lapses less than 3 months before the end of employment with the trust.

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform (letter of reassurance and DBS confirmation).

We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the academy. This section applies to our use of alternative provision (AP).

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out, as detailed in appointing new staff.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

### **Governance**

| <b>Role</b>                   | <b>DBS</b> | <b>Barred List</b> | <b>S128</b> |
|-------------------------------|------------|--------------------|-------------|
| Trustee                       | Enhanced   | No                 | Yes         |
| ELT                           | Enhanced   | Yes                | Yes         |
| National                      | Enhanced   | Yes                | Yes         |
| Regional                      | Enhanced   | Yes                | Yes         |
| Ambassador<br>(Amber lanyard) | Enhanced   | Yes*               | Yes         |

*\*Opt out available but would result in full supervision (red lanyard)*

All persons within our Trust governance structure will have the above checks completed prior to commencement of their role. Some checks are determined by whether their role includes working in regulated activity with children at an academy.

All other checks in line with the Trust SCR and Safer Recruitment Policy also apply. The Chair of the Board of Trustees will have their DBS countersigned by the Secretary of State.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil (under 16) on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity. It will also depend on whether the individual(s) are supervised themselves and providing support frequently (more than 30 days in 30 or overnight). The decision and any risk assessment required will be recorded on CPOMS.

If a pupil (over 16) is on work experience that gives the opportunity for contact with children, then consideration should be given on whether an enhanced DBS check is required for the pupil themselves.

### **Pupils staying with host families**

Where the academy makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those individuals.

Where the academy is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

This will be supported by any relevant intelligence/information to assess the suitability. The decision and any risk assessment required will be recorded on CPOMS.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff at reception. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge. The academy will issue a red lanyard to the visitor if the academy has not completed all the relevant checks.

### **If a visitor is wearing a red lanyard, they cannot be left unsupervised in the academy at any point.**

Visitors in a professional capacity will have identity checked and we will obtain assurance that an appropriate DBS check is in place alongside a letter of reassurance.

All visitors to our setting, including external organisations, will be always accompanied by a member of staff in regulated activity. We will carefully consider the suitability of input from external organisations including an assessment of the educational value, age appropriateness and relevant checks.

We will not invite into the academy any individual/organisation who is known to disseminate extremist views and we will carry out appropriate checks to ensure that any individual/organisation using academy facilities is not seeking to disseminate extremist views or radicalise pupils, parents, or staff.

### **Work experience**

Where an academy enables an individual to gain experience of working in a school environment, it is important that appropriate checks are completed prior to commencing the role. If the individual is over 16 then a DBS should be applied for unless the individual is fully supervised in line with the below:

- *There must be supervision by a person who is in regulated activity, the supervision must be regular and day to day; and the supervision must be 'reasonable in all the circumstances to ensure the protection of children'*

Where this is the case, appendix 1 of the E-ACT Safer Recruitment Process must be completed as the risk assessment. This must be shared and understood with relevant stakeholders prior to commencing the role.

If the role is planned for longer than one half-term, then the volunteers process should be completed.

## 5. The role of the Designated Safeguarding Lead

The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and social-worker children). This should be explicit in the role holder's job description. **The DSL must be a member of the senior leadership team.**

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The DSL should understand when they should consider calling the Police and what to expect when they do.

During term time, the DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

### Deputy Designated Safeguarding Leads

The Deputy Designated Safeguarding Leads should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. The deputy (or multiple deputies) must be able to perform the role of the DSL in the absence of the DSL.

## 6. Local safeguarding arrangements

### Milton Keynes MASH:

The MASH has a core team of representatives from Children's Social Care, police, health and adult safeguarding co-located at Civic, 1 Saxon Gate East, Milton Keynes. It also has links with education, probation, housing, youth offending team and CAMHS (Child and Adolescent Mental Health).

### How does MASH work?

The MASH team receives information from professionals and members of the public raising concerns or requesting advice or support. It makes decisions on actions to be taken by:

- Using a RAG rating (Red\Amber\Green) to determine urgency of response required
- Sharing information securely between agencies to enable informed decision-making
- Managers decide the most appropriate interventions for the child's identified needs

### What interventions may be offered by MASH?

- Children and Family assessment by Children's Social Care
- Early intervention support through Children and Families practice
- Early help assessment
- Advice about support services that may be available

### How to contact the MASH

- Call 01908 253169 or 253170.
- Email [children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)

- Complete the Multi Agency Referral Form (MARF)

**Out of Hours call 01908 265545**

**Milton Keynes LADO:**

The Local Authority Designated Officer (LADO) is the person who should be notified when there are allegations against a person who works with children that is paid, unpaid, volunteers, casual, agency or anyone self-employed.

If you have concerns, please contact the Local Authority Designated Officer (LADO): [LADO@milton-keynes.gov.uk](mailto:LADO@milton-keynes.gov.uk) or call the LADO on 01908 254307 and ask for the LADO.

**External Agencies:**

Alongside MASH and the Targeted Early Help Team Ousedale School works with a wide range of external agencies to ensure support for our pupils. These include:

**YOUNG PERSON'S SANCTUARY:** The Young Person's Sanctuary is available for young people aged 11–17 years old (11–13-year-olds must be accompanied by a legal guardian or carer) who are experiencing mental distress or crisis or simply need a safe space to access support. No one will ever be turned away. Young people are welcome to bring anyone from their support system. Young people do not need to be known to mental health services to attend. Young people can still attend even if they are currently receiving support from CAMHS.

**CAMHS:** We have CAMHS triage appointments taking place in school weekly to meet with pupils and signpost additional support.

**CHUMS (who have replaced Young Carers):** CHUMS is a Young Carers Service that supports children and young people aged 5-18 who are helping to care for someone with a disability, chronic or serious illness, mental health condition, learning difficulty etc, whether that be a parent or sibling.

**YDAS:** Youth drug and alcohol solutions team (YDAS) deliver a high quality and caring service for young people aged 18 and under (up to 25 with additional needs). The service works with young people who are affected by their own, or someone else's, substance use or those who would like to gain more knowledge, whether they use substances or not.

We also have an extensive range of support available in school for pupils and parents. If you have any concerns, please contact the relevant Pastoral and Academic Leader (PAL) and they will be able to support.

**The following services are also available to pupils and parents:**

- KOOH: Free, safe and anonymous online support for young people [www.Kooth.com](http://www.Kooth.com)
- SAMARITANS Call Samaritans for support on the phone, 24 hours a day, 365 days a year. Call free on 116 123 <https://www.samaritans.org/>
- YOUNGMINDS Text YoungMinds Crisis Messenger if you are under 25 and experiencing a mental health crisis and need support. This free text service provides free, 24/7 crisis support across the UK. You can text YM to 85258 <https://www.youngminds.org.uk/>
- POPYRUS Call Papyrus if you are experiencing suicidal thoughts, with trained professionals giving support, advice and information to young people. 0800 068 4141 (Mon to Fri, 9 am – 10 pm) (Weekends and bank holidays, 2 pm to 10 pm). <https://www.papyrus-uk.org>
- NHS Dial 111 if you need medical help quickly, but it's not an immediate risk or if it is out-of-hours for your General Practitioner (GP) surgery. Or 999 if you or someone else is in crisis.

## Child Protection and Safeguarding

### APPENDICES

#### Appendix 1

This policy should be read alongside the following policies and guidance:

| E-ACT Policies   |
|--|
| <ul style="list-style-type: none"><li>• Acceptable Use of Mobile Phones Policy</li><li>• Pupil Behaviour Policy</li><li>• Whistleblowing Policy</li><li>• Code of Conduct Policy</li><li>• Complaints Policy</li><li>• Health and Safety Policy</li><li>• Attendance Policy</li><li>• Online Safety Policy</li><li>• Social Media Policy</li><li>• Relationships Sex &amp; Health Education Policy (Primary or Secondary)</li><li>• Supporting Students with Medical Needs Policy</li><li>• Pupil Mental Health and Wellbeing Policy</li><li>• Information and Records Retention Policy</li><li>• SCR and Safer Recruitment Policy</li><li>• Lettings Policy</li></ul> |

## Appendix 2

This policy should be read alongside the following Government Guidance documents

| Government Guidance  |
|--|
| <ul style="list-style-type: none"> <li>• <a href="#">Arranging Alternative Provision 2025</a></li> <li>• <a href="#">Behaviour in schools (2024)</a></li> <li>• <a href="#">Children Missing Education (2024)</a></li> <li>• <a href="#">Data protection: a toolkit for schools (2018; Updated 2018, updated 2024)</a></li> <li>• <a href="#">Designated teacher for looked after and previously looked after children (2018)</a></li> <li>• <a href="#">Disqualification under the Childcare Act 2006 (2018)</a></li> <li>• <a href="#">Education for children with health needs who cannot attend school (2013)</a></li> <li>• <a href="#">Exclusion from maintained schools, academies, and pupil referral units in England (2017; Updated 2021)</a></li> <li>• <a href="#">Guidance for Safer Working practice for Adults who work with Children and Young People in Education (2019)</a></li> <li>• <a href="#">Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers (2018)</a></li> <li>• <a href="#">Keeping Children Safe in Education 2024</a></li> <li>• <a href="#">Keeping children safe in out of school settings guidance (2022)</a></li> <li>• <a href="#">Listening to and involving children and young people (2014)</a></li> <li>• <a href="#">Mandatory Reporting of Female Genital Mutilation – procedural information (2015; Updated 2020)</a></li> <li>• <a href="#">Modern Slavery: how to identify and support victims (2020; Updated 2021, updated 2023)</a></li> <li>• <a href="#">Multi-Agency statutory guidance on female genital mutilation (2016; Updated 2020)</a></li> <li>• <a href="#">Prevent Duty Guidance for England and Wales (2015; updated 2021, updated 2024)</a></li> <li>• <a href="#">Preventing and tackling bullying (2013; Updated 2017)</a></li> <li>• <a href="#">Promoting the education of looked-after and previously looked-after children (2014; Updated 2018)</a></li> <li>• <a href="#">Relationships Education, Relationships and Sex Education, and Health Education in England (2019; Updated 2020, updated 2021)</a></li> <li>• <a href="#">Safeguarding children and protecting professionals in early years settings: online safety considerations (2019)</a></li> <li>• <a href="#">School Admissions Code (2021)</a></li> <li>• <a href="#">School attendance: parental responsibility measures (2015; Updated 2020)</a></li> <li>• <a href="#">Teaching online safety in schools (2019, updated 2023)</a></li> <li>• <a href="#">The Equality Act 2010: advice for schools (2014; Updated 2018)</a></li> <li>• <a href="#">The Teachers’ Standards (2011; Updated 2021)</a></li> <li>• <a href="#">UKCIS: Sharing of nudes and semi-nudes (2020)</a></li> <li>• <a href="#">UKCIS: Using External Visitors to Support Online Safety Education (2018, updated 2022)</a></li> <li>• <a href="#">Use of Reasonable Force in Schools (2013)</a></li> <li>• <a href="#">What to do if you’re worried a child is being abused: advice for practitioners (2015)</a></li> <li>• <a href="#">Working Together to Improve School Attendance (2022)</a></li> <li>• <a href="#">Working Together to Safeguard Children</a></li> </ul> |